UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

PROMOTE INNOVATION LLC,	)	
	)	Case No. 3:11-cv-01338
Plaintiff	)	
	)	
v.	)	
	)	
SCHERING CORPORATION, ET AL.	)	JURY TRIAL DEMANDED
	)	
Defendant.	)	

UNOPPOSED MOTION TO DISMISS WITH PREJUDICE

In light of the enactment of the Leahy-Smith America Invents Act, Plaintiff Promote Innovation LLC ("Promote") moves to dismiss with prejudice all claims made by Promote against the above-named defendants ("Defendants") in the above-captioned case. All costs and expenses relating to this litigation (including attorneys' and expert fees and expenses) should be borne solely by the party incurring the same.

A proposed Order accompanies this motion.

Dated: October 17, 2011

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of October 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Gerald Krovatin
Gerald Krovatin